



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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331073

September 24, 2009

Ms. Sharon J. Jaffess
United States Environmental Protection Agency
77 West Jackson Boulevard
Mail Code S-5J
Chicago, Illinois 60604-3507

Re: 1358070001 – Montgomery County
Eagle Zinc National Priorities List Site
ILD 980 606 941
Superfund/Technical Reports

Dear Ms. Jaffess:

The purpose of this letter is to transmit the formal concurrence of the Illinois Environmental Protection Agency on the Record of Decision for the Eagle Zinc National Priorities List (NPL) Site, Operable Unit 1 in Hillsboro, Illinois.

If you should have any questions, need any additional information, or require any assistance regarding this matter, please contact me at 217-524-1655 or via electronic mail at: clarence.smith@illinois.gov.

Respectfully,

Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

Attachment

DECLARATION FOR THE RECORD OF DECISION

Selected Remedy for the
Eagle Zinc National Priorities List Site – Operable Unit 1
Hillsboro, Montgomery County, Illinois

SITE NAME AND LOCATION

1358070001 – Montgomery County
Eagle Zinc National Priorities List Site – Operable Unit 1
CERCLIS Identification Number ILD 980 606 941
Hillsboro, Montgomery County, Illinois

STATEMENT OF BASIS AND PURPOSE

This decision document represents the selected remedial actions for the Eagle Zinc National Priorities List (NPL) site, Operable Unit 1, Hillsboro, Illinois, (CERCLIS identification number ILD 980 606 941). The United States Environmental Protection Agency (USEPA), in consultation with the Illinois Environmental Protection Agency (Illinois EPA), chose the interim remedy in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA or Superfund) and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP, 40 Code of Federal Regulations (CFR) 300 – 399). Our decisions are based on the Administrative Record for the Eagle Zinc NPL site.

This declaration indicates the State of Illinois' concurrence with the selection of Alternative 2 – Building Demolition and Management of Waste Materials. When USEPA receives the State's letter of concurrence, it will be attached to the Interim Record of Decision (ROD).

ASSESSMENT OF THE SITE

The response actions selected in the Interim ROD (ROD) are necessary to protect the public health or welfare or the environment from the actual or threatened release of hazardous substances, pollutants, or contaminants into the environment.

DESCRIPTION OF THE SELECTED REMEDY

USEPA has identified the site's buildings as the media of concern for this interim remedy at the Eagle Zinc NPL site. The selected remedy is considered an interim remedial action for the site. This limited-scope action is intended to only address the contamination associated with the buildings, structures on-site and associated materials. A final response action to fully address the threats posed by the Eagle Zinc NPL site will be taken in Operable Unit 2 (OU 2) upon completion of the remedial investigation/feasibility study (RI/FS) and any necessary supplemental evaluations at the site.

The selected remedial actions for the buildings include:

- **Building Demolition:** The demolition of all buildings on-site, including manufacturing building, office buildings, and laboratories;
- **Off-site disposal of Asbestos Containing Materials and Putrescible Wastes:** Putrescible wastes and asbestos will be sent off-site for proper disposal;
- **Recycling:** Recycling of steel, metal, bricks and other recyclable materials. Any material eligible for recycling will be decontaminated to a level of contamination acceptable to the recycling facility;
- **On-site Management Cell with Soil Cover:** The consolidation of demolition debris on-site with a one-foot soil cover will temporarily manage the consolidated debris and the vegetative portion of the soil cover will use native grasses, which require limited maintenance; and
- **Management of Wastes:** All non-hazardous waste will be managed on-site under a one-foot soil cover. Any Resource Conservation and Recovery Act of 1976, as amended (RCRA) hazardous wastes will be placed on-site, covered with material such as a tarp and incorporated with the final remedial action.

The selected interim remedy will result in the demolition of the dilapidated and contaminated buildings and is expected to prevent or abate actual or potential exposure to nearby human populations or animals from hazardous substances located in and on site buildings either from direct contact or from potential releases. The selected interim remedy will also protect potential trespassers and others who access the property and potential future site workers, preventing direct exposure to and potential release of the high lead concentrations in and on building and associated structures.

The selected interim remedy, Alternative 2, provides the best balance of the nine NCP evaluation criteria, is congruent with the anticipated final remedial action, and utilizes green-remediation practices, to the extent practicable. The NCP establishes an expectation that USEPA will use treatment to address the principal threats posed by a site wherever practical. The principal threat concept is applied to the characterization of “source material” at a Superfund site. The building materials in the scope of this remedy are not considered principle threat wastes. However, waste piles found inside the buildings are considered principle threat wastes as defined by the NCP because they are highly toxic materials and they act as a source for direct exposure to significantly high concentrations of lead. The principle threat wastes will be segregated onsite, provided with an interim cover, and be included in the final remedial action.

STATUTORY DETERMINATIONS

The selected interim remedial actions are protective of human health and the environment, comply with Federal and State of Illinois requirements that are applicable or relevant and appropriate to the remedial actions, are cost-effective, and utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. All salvageable materials from the buildings will be recycled or reused. The remaining materials not disposed of off-site will be consolidated for temporary on-site management until the final remedy is selected. The final remedy will utilize permanent remedies to the extent practicable.

The selected interim remedy herein satisfies the statutory preference for treatment as a principal element of the interim remedy because this limited-scope action is intended only to address the contamination associated with the buildings, structures on-site, and associated materials. By decontaminating the recyclable/reusable material and appropriately treating and disposing of the decontamination waste water, the selected interim remedial action provides for treatment of some of the contamination. The preference for treatment of the remaining building debris and other contamination at the site will be addressed in the final remedy (Operable Unit 2), upon completion of the RI/FS and any necessary supplemental evaluations. Because this interim remedy will result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years of the remedial action to ensure that the interim remedy is, or will be, protective of human health and the environment.

A Proposed Plan was released for public comment in May 2009. It identified Alternative 2, building demolition and on-site management of debris and waste, as the Preferred Alternative for remediation. During the public comment period, USEPA discovered errors in the estimated costs of Alternatives 2 and 3. The recalculated costs show a significant increase for both Alternatives. Because the No Action option is unacceptable and the cost increases for the acceptable alternatives were roughly comparable; these increased costs did not alter the USEPA's rationale for preference of Alternative 2 as the Selected Remedy for the site.

ROD DATA CERTIFICATION CHECKLIST


USEPA has included the following information in the Decision Summary section of the Eagle Zinc site Interim ROD. Additional information can be found in the Administrative Record for this site.

- Chemicals of concern (COCs) and their respective concentrations (See Section 2)
- Risk represented by the COCs. A baseline risk assessment was not conducted for this interim action due to the immediate need to take action. However, Section 7 summarizes the risks associated with the buildings (Operable Unit 1).

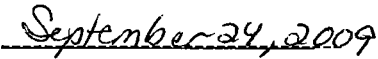
Declaration for the Record of Decision
Eagle Zinc National Priorities List Site – Operable Unit 1
1358070001 – Montgomery County
ILD 980 606 941
Page 4 of 4

- Whether source materials constituting principal threats are found at the site (See Section 11).
- Cleanup levels established for the COCs and the basis for these levels. Cleanup levels are not appropriate for this interim remedy, which addresses demolition and covering debris and waste from highly contaminated buildings and associated materials. The site cleanup level will be determined in the final selected remedy.
- Current and future land use assumptions used in the ROD (See Section 6).
- Potential land and ground water use that will be available at the site as a result of the Selected Remedy. As a result of the selected interim remedy there will not be any change from the current land use. However, Section 6 describes the potential for land use after the completion of the final remedial action.
- Estimated capital, annual operation and maintenance (O&M), and total present worth costs; discount rate; and the number of years over which the remedy cost estimates are projected (See Section 13).
- Key factor(s) that led to selecting the remedy (See Section 10).

AUTHORIZING SIGNATURE



Douglas P. Scott, Director
Illinois Environmental Protection Agency



Date